## quinn emanuel trial lawyers | new york

500 W. Madison St. Suite 2450, Chicago, Illinois 60661 | TEL: (312) 705-7400 FAX: (312) 705-7401

WRITER'S DIRECT DIAL NO. (312) 705-7474

WRITER'S INTERNET ADDRESS jenniferbauer@quinnemanuel.com

October 14, 2014

FOIA Officer
U.S. Environmental Protection Agency
U.S. EPA Region 9,
FOIA Officer OPA-3
75 Hawthorne Street,
San Francisco, CA 94105

## **Re:** Freedom of Information Act Request

Dear Sir/Madam:

This is a request for records under the Freedom of Information Act, 5 U.S.C. § 552 (FOIA), from the United States Environmental Protection Agency (EPA). We respectfully request that the EPA provide every document, irrespective of its date, that is related to the presence of asbestos, remediation of asbestos, asbestos emissions, or that refers or alludes in any way to asbestos or the potential for asbestos at:

- 1. 921 Crown Avenue, Santa Barbara, California;
- 2. 800 E La Cadena Dr, Riverside, California;
- 3. 7334 H. Hollister Ave, Goleta, California; and
- 4. 101 Ash Street, San Diego, California.

We respectfully request that you provide all documents relating to asbestos-containing

## quinn emanuel urquhart & sullivan, Ilp

LOS ANGELES | 865 South Figueroa Street, 10th Floor, Los Angeles, California 90017-2543 | TEL (213) 443-3000 FAX (213) 443-3100 SAN FRANCISCO | 50 California Street, 22nd Floor, San Francisco, California 94111-4788 | TEL (415) 875-6600 FAX (415) 875-6700 SILICON VALLEY | 555 Twin Dolphin Drive, 5th Floor, Redwood Shores, California 94065-2139 | TEL (650) 801-5000 FAX (650) 801-5100 CHICAGO | 500 W. Madison Street, Suite 2450, Chicago, Illinois 60661-2510 | TEL (312) 705-7400 FAX (312) 705-7401 WASHINGTON, DC | 1299 Pennsylvania Avenue NW, Suite 825, Washington, District of Columbia 20004-2400 | TEL (202) 538-8000 FAX (202) 538-8100 LONDON | 16 Old Bailey, London EC4M 7EG, United Kingdom | TEL +44 20 7653 2000 FAX +44 20 7653 2100 TOKYO | NBF Hibiya Building, 25F, 1-1-7, Uchisaiwai-cho, Chiyoda-ku, Tokyo 100-0011, Japan | TEL +81 3 5510 1711 FAX +81 3 5510 1712 MANNHEIM | Mollstraße 42, 68165 Mannheim, Germany | TEL +49 621 43298 6000 FAX +49 621 43298 6100 MOSCOW | Paveletskaya Plaza, Paveletskaya Square, 2/3, 115054 Moscow, Russia | TEL +7 499 277 1000 FAX +7 499 277 1001

FOIA Officer October 14, 2014 Page | 2

products, asbestos testing, abatement, or remediation, any asbestos management plan proposed or initiated (whether or not conforming to EPA guidelines), National Emissions Standards for Hazardous Air Pollutants (or state equivalent) records, Asbestos Hazard Emergency Response Act (or state equivalent) records, and/or anything else related to asbestos at any of the above locations.

Please note that the term "document," as used herein, refers to any kind of written, typewritten, or printed material and shall include, without limitation, notes, internal or external memoranda, letters, electronic mail, permits, log entries, reports, telegrams, spreadsheets, databases, calendar entries, records, drafts, working papers, publications, or hard discs and printouts within EPA's possession, custody, or control. This request includes all responsive documents in their entirety, including each attachment, enclosure, and exhibit.

The requester is a commercial user for fee purposes. In addition to inspection, we would like to discuss the possibility of a complete production of certified documents responsive to this FOIA request. Please provide a fee estimate for this FOIA request.

Should you have any questions, please do not hesitate to contact me at (312) 705-7474. Thank you for your attention in this matter.

Very truly yours,

Jennifer Bauer 03981.00009/6280980.1